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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

GAIL CORVELLO, ET AL	)	
KEVIN BURNS, ET AL	)	
COLLEEN BIGELOW, ET AL	)	
and SHEILA REIS, ET AL	)	
	)	
VS.	)	C.A. NOS. 05-221S, 05-422S
	)	05-274S and 05-370S
NEW ENGLAND GAS COMPANY;	)	
SOUTHERN UNION COMPANY	)	
	)	
VS.	)	
	)	
BRIDGESTONE AMERICAS TIRE	)	
OPERATIONS, LLC and	)	
HONEYWELL INTERNATIONAL INC.	)	

**AFFIDAVIT OF ROBERT L. HOFFMAN, P.E.**

I, Robert L. Hoffman, hereby make affidavit as follows:

1. I am the President and owner of Hoffman Engineering Inc. ("HEI");
2. HEI is the remediation contractor for the Bay Street Neighborhood in Tiverton, Rhode Island;
3. HEI has been engaged in remediation activities in the Bay Street Neighborhood since approximately April, 2011;
4. As part of HEI's duties in remediating the neighborhood, HEI is required to remediate property in accordance with the Memorandum of Understanding ("MOU") executed by the Rhode Island Department of Environmental Management, the Town of Tiverton, and Bay Street Neighborhood LLC;
5. I am familiar with the location of Southern Union Company's subpoena of Lot 41-35;
6. Lot 41-35 owned by the Simpson Family Trust has been remediated in accordance with the MOU and requires no further remediation under any local, state, or federal standards;

7. There is a small portion of the area on lot 41-35 which will require the recording of Environmental Land Usage Restrictions; and

8. Over the course of the entire remediation project beginning in August, 2009, approximately 33,000 tons of material have been excavated and removed from the neighborhood.

  
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Robert L. Hoffman, P.E.

Subscribed and sworn to before me this 18<sup>th</sup> day of April, 2012.

Maureen E. Sundin  
NOTARY PUBLIC  
My commission expires: 6/21/13